UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 12 2017

REPLY TO THE ATTENTION OF

WC-15J

CERTIFIED MAIL 7009 1680 0000 7645 8054
RETURN RECEIPT REQUESTED

Ex. 6 (Personal Privacy)

Facility Owner, Skyline Blue Acres
Ex. 6 (Personal Privacy)

Subject: April 20, 2017 Compliance Evaluation Inspection

Dear Ex. 6 (Personal Privacy)

Enclosed, please find a copy of the U.S. Environmental Protection Agency Inspection Report for the Concentrated Animal Feeding Operation inspection conducted at Skyline Blue Acres on April 20, 2017. The purpose of the inspection was to evaluate and document compliance of the Skyline Blue Acres with the Clean Water Act.

Should you find anything in the report that you disagree with, please provide a detailed response within thirty (30) calendar days.

Thank you for your prompt attention to this matter. If you have any questions, please contact Joan Rogers of my staff at (312) 886-2785.

Sincerely,

Ryan J. Bahr, Chief, Section 2
Water Enforcement and Compliance Assurance Branch

Enclosures

CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose:
Compliance Evaluation Inspection

Facility:
Skyline Blue Acres
Ex. 6 (Personal Privacy)
[redacted]

Kewaunee County
Ex. 6 (Personal Privacy)

NPDES Permit Number:
WI-0063410-02-0

Date of Inspection:
April 20, 2017

EPA Representatives:
Joan Rogers, Environmental Scientist 312-886-2785
rogers.joan@epa.gov

Carla Valdes, Enforcement Officer 312-353-0724
Valdes.carla@epa.gov

State Representatives:
None

Facility Representatives:
Ex. 6 (Personal Privacy)
[redacted] Ex. 6 (Personal Privacy)

Report Prepared by:
Joan Rogers, Environmental Scientist

Report Date:
May 16, 2017

Inspector Signature: Joan Rogers

Approver Signature: [signature]

Approval Date: 6/12/17

1. BACKGROUND

The purpose of this report is to describe, evaluate and document the Skyline Blue Acres' compliance with the Clean Water Act (CWA) and its Wisconsin Pollution Discharge Elimination System (WPDES) permit at its Denmark, Wisconsin facility on April 20, 2017. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

Skyline Blue Acres is a beef cattle operation in Kewaunee County. The facility confines approximately 970 head of cattle and is therefore considered a medium operation.

Surface flow is generally to the south, but there is an intermittent unnamed tributary that bisects the facility from north to south. The intermittent unnamed tributary flows to perennial Black Creek approximately 0.9 miles to the southwest. Black Creek flows to the Neshoto River after approximately 0.80 miles and the Neshoto River flows approximately 4.25 miles before it confluences with the West Twin River. Approximately 15 miles later, the West Twin River joins the East Twin River which in turn flows into Lake Michigan in less than a quarter of a mile.

The West Twin River is the first Traditional Navigable Water along this surface flow pathway and is on the 2016 303d list as impaired for Dissolved Oxygen, PCBs, and Phosphorus. The East Twin River is also on the 2016 303d list, impaired for PCBs and Mercury. Lake Michigan shore in Manitowoc County is on the 2016 303d list, impaired for PCBs.

The facility operates under WPDES Permit number WI-0063410-02-0. The permit expired on February 28, 2017 and has been administratively extended. The facility did not apply for a new permit until February 22, 2017 and was issued a Notice of Noncompliance by WDNR for not applying for the new permit in the appropriate time frame.

In August 2016, the facility was inspected by WDNR and the county's staff. WDNR noted that there were no controls for runoff from the silage bags and high moisture corn storage. Additionally, the facility received a Notice of Noncompliance on August 12, 2016, for spreading solid manure over exposed bedrock. The WDNR inspection checklist states that the facility is substantial compliance with the permit but required that the facility address the issue of collection of runoff from feed.

2. SITE INSPECTION

Table 1: Site Entry

Arrival Time:	9:15 A.M.
Temperature:	42°F
Precipitation:	Light Rain
Presented credentials?	Yes

Credentials presented to whom and at what time?	Facility Owner
EPA vehicle parked in approved location?	Yes
Location where EPA vehicle was parked?	Alongside old barn.
Disposable boots worn?	Yes
Other bio-security measures taken:	Washed vehicle after inspection.

2.1 Records Review (The following Records Review tables reflect information provided before the walk-through of the facility, unless otherwise noted.)

Table 2: Documents

Checklist(s) Used	
R5 CAFO Boilerplate Inspection Report as Checklist	
Facility Documents Reviewed:	
Nutrient Management Plan	
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?	No
Which information does the facility consider to be CBI?	N/A

Table 3: Facility Description

Type of Animal	**Number of Animals**	**Capacity**	**Type of Confinement**
Beef Cattle	970	1300	Barns
Minimum Number of Animals in previous 5 years:			500
Maximum Number of Animals in previous 5 years:			1300
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:			970
Amount of Liquid Manure Generated per year:			Approx. 2,580,000 gallons
Amount of Solid Manure Generated per year:			
Does the facility have an NPDES Permit?			Yes
SIC or NAICS code:			0211
CAFO Designation Date (If a designated CAFO)			2006
CAFO Designation Reason (If a designated CAFO)			Number of Animals
Do animals have direct access to WOUS?			No
Are crops, vegetation, forage growth, or post harvest residues sustained in the normal growing season over any portion of the lot or facility where animals are kept?			No
What is the area (acres) of the production area?			Unknown
What is the area (acres) of the pasture?			N/A
How many employees (not counting family members)?			2
Other facilities under common ownership (name and address):			

None

Table 4: Livestock Waste Storage

Type of Storage	Storage Capacity	Type of Liner	Depth Markers Present	Last Time Waste was Removed	Amount of Waste Removed	Days of Storage
Pond	1,500,000 million gallons	Clay	Yes	December 1, 2016	630,000 gallons	330
Pit	400,000 gallons	Concrete	No			

Records at site of storage structure design?	Yes
Is manure stored for the short term? If yes, describe where it is stored, how it is drained and where it drains to.	Yes, in approved field.
Are records kept of the level of manure in the storage structures?	Yes
When was the last time a storage structure was emptied, either partially or completely?	December 1, 2016
What amount of manure or process wastewater was removed the last time the storage structure was emptied, either partially or completely?	630,000 gallons (approximately)
Do the facility personnel inspect and keep records of all diversion devices?	Yes
Do the facility personnel inspect and keep records of all impoundments?	Yes
Do the facility personnel inspect and keep records of all the water lines?	Yes
Do the facility personnel perform routine visual inspections and keep records of the production area?	Yes
Does the waste storage system have a managed outfall or discharge point? If yes, provide a description of the outfall and a description of the area receiving the discharge.	No
Has the facility had any documented discharges of livestock waste to surface water in the past year?	No
Are there safety devices installed around any manure storage ponds? (Barriers at the end of manure push off platforms, fences around pond, signage.)	Yes
Additional Information:	None

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:	
When manure is wet from precipitation, the manure is scraped from the four barns to the center scrape alley and then to the Manure Pond. When it is dry, the manure is hauled and stacked until it can be land applied. In the slotted barns, the manure falls to a pit and is emptied directly into a 5000-gallon tanker via a pump. The manure is then land applied.	
Describe the way used bedding is collected and disposed of at the facility:	
Bedding is not used in any of the barns except in the slotted barn, where it is disposed of with the manure.	
Are mortality records kept?	Yes
Describe the way mortalities are managed at the facility:	
Sandy Bay Mink Ranch is paid to haul away any mortalities.	
What type of method is used to provide drinking water for the animals?	Self-watering drinkers.
Describe the way spilled drinking water is collected and disposed of at the facility:	
Hauled with the manure.	
Describe the way mist cooling water is collected and disposed of at the facility:	
Not used.	
Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:	
No chemicals used.	
Describe the way water that has been used to wash/flush barns is collected and disposed of at the facility:	
Barns are not washed or flushed.	
Describe where water comes from that is used to clean and/or flush. (Wells, city, etc.)	
N/A	
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:	
Silage bags are kept closed with tarps. Silage is put up very dry and facility owner states that there is no runoff.	
If a dairy, describe how process wastewater from the plate cooler water is collected and disposed of at the facility:	
N/A	
If a dairy, describe how process wastewater from the cleaning of the milking parlor is collected and disposed of at the facility:	

N/A
If a dairy, describe how process wastewater from the cleaning of the milk tanks is disposed of at the facility:
N/A

If a dairy, how many times per day are cows milked?	N/A

Table 6: Land Application and Disposal of Manure and Process Wastewater

Does the facility perform and keep records of the manure testing?	Yes
When was the last time a sample was taken of the manure and/or process wastewater?	December 2016
Describe the process to take the manure and/or process wastewater sample.	Facility owner has a 10' stick that has a coffee can attached to it. Sample is taken from manure while pumping.
Number of acres available for land application:	Facility owner owns 1296 acres and rents an additional 496 acres.
Are land application records kept?	Yes
Who applies the manure and process wastewater to the fields?	Facility owner either applies the manure or hires Gruetts Inc.
Are weather conditions at time of application kept? (24 before – 24 after)	Yes
Does the facility perform and keep records of the soil testing?	Yes, every four years.
Is manure transferred off-site to another party?	No
Are manure transfer records maintained?	N/A
Do facility personnel perform periodic inspection of land application equipment?	Yes

Table 7: Receiving Surface Waters

Describe the surface flow pathways:
Surface flow is generally to the south, but there is an intermittent unnamed tributary that bisects the facility from north to south. The intermittent unnamed tributary flows to perennial Black Creek approximately 0.9 miles to the southwest. Black Creek flows to the Neshoto River after approximately 0.80 miles and the Neshoto River flows approximately 4.25 miles before it confluences with the West Twin River. Approximately 15 miles later, the West Twin River joins the East Twin River which in turn flows into Lake Michigan in less than a quarter of a mile.

How many months out of the year is there flow in the nearest surface water pathway:	The intermittent unnamed tributary only has flow in it when it rains.
Are there any storm water pathways entering the facility?	Yes
Are there any clean water ponds on site?	No
What is the name of the first waterway that is identified as a Traditional Navigable Water (TNW) for surface flow from the facility?	West Twin River
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent or perennial?	Intermittent
Has the surface water pathway nearest to the facility been assessed for water quality?	No, but Black Creek and Neshoto River were assessed in 2006.

Table 8: Nutrient Management Plan

NMP on site?	Yes
Date NMP Submitted:	Unknown
Planner Name/Company:	Pat Van Durzen with United Cooperative
Date that the NMP was last updated:	March 17, 2017
Storage Description:	Yes
Amount of Manure Generated:	Yes
Capacity of Storage:	Yes
Duration of Storage:	Yes
Amount of Spreadable Land:	Yes
Mortality Management Plan:	Separate Plan
Clean Water Diversion System:	Did not observe
Direct Contact Prevention Plan:	All animals are confined.
Chemical Management Plan:	Not needed.
Conservation Practices:	Yes
Manure Testing Protocols:	Yes
Soil Testing Protocols:	Yes
Land Application Protocols:	Yes
Additional NMP comments:	None
Does the NMP reflect the current operational characteristics?	Yes
Are the number of acres owned/leased consistent with what is listed in the NMP?	Yes

Table 9: Land Application Records (details of the records reviewed)
EPA did not observe any land application records during the inspection. But the facility owner stated that 2.58 million gallons of manure were spread in spring, summer and fall 2016.

Table 10: Facility Records (details of the records reviewed)
EPA did not observe any facility records.

Table 11: NPDES Permit

Type of permit (General, individual)	General
Is a copy of the permit on site?	Yes
Date that the permit was issued:	March 1, 2012
Date that the permit will expire:	February 28, 2017
Permitted number of animal units:	Not listed
Does the permit contain a compliance schedule?	No
Have there been any changes made to the production area since the permit was issued?	No
Are there any practices in the permit that are not being done at the facility? (Records kept, inspections performed, etc.)	No

2.2 Walkthrough of the Facility

Refer to the Photolog and Walkthrough document for details of the walkthrough of the facility.

2.3 Closing Conference and Post-Inspection

Table 12: Post Walk-Through

Were specific "Potential Violations" discussed with facility personnel?	N/A
Were specific "Areas of Concern" discussed with facility personnel?	N/A
Who were the Potential Violations or Areas of Concern discussed with?	N/A
Compliance assistance materials given to facility personnel:	
WDNR Flier "Don't Burn Agricultural Plastics"	
"Wisconsin's Runoff Rules" Flier	
USDA/NRCS Flier "Most Common Conservation Practices – Confined Livestock"	
U.S. EPA Flier "Concentrated Animal Feeding Operations Final Rulemaking – Fact Sheet	
U.S. EPA Flier "Small Business Resources Information Sheet"	
USDA/NRCS Flier "EQIP – Environmental Quality Incentives Program"	
Exit Time:	1:00 P.M.

Disposable Boots Left at Facility?	Yes
Vehicle Washed after leaving facility?	Yes
Date and Time that vehicle was washed:	During fueling later in the day.

Table 13: Waterway Documentation

List the pathway taken by EPA inspectors to document the waterway at the facility.
EPA observed the intermittent unnamed tributary that bisects the facility. The tributary flows into a culvert that goes under the facility driveway and outlets north of County Road BB. The tributary then flows into a culvert under County Road BB and outlets on the south side of the road.

Table 14a: Sampling Information
EPA did not take any samples during the inspection.

3. POTENTIAL VIOLATIONS

EPA did not observe any potential violations.

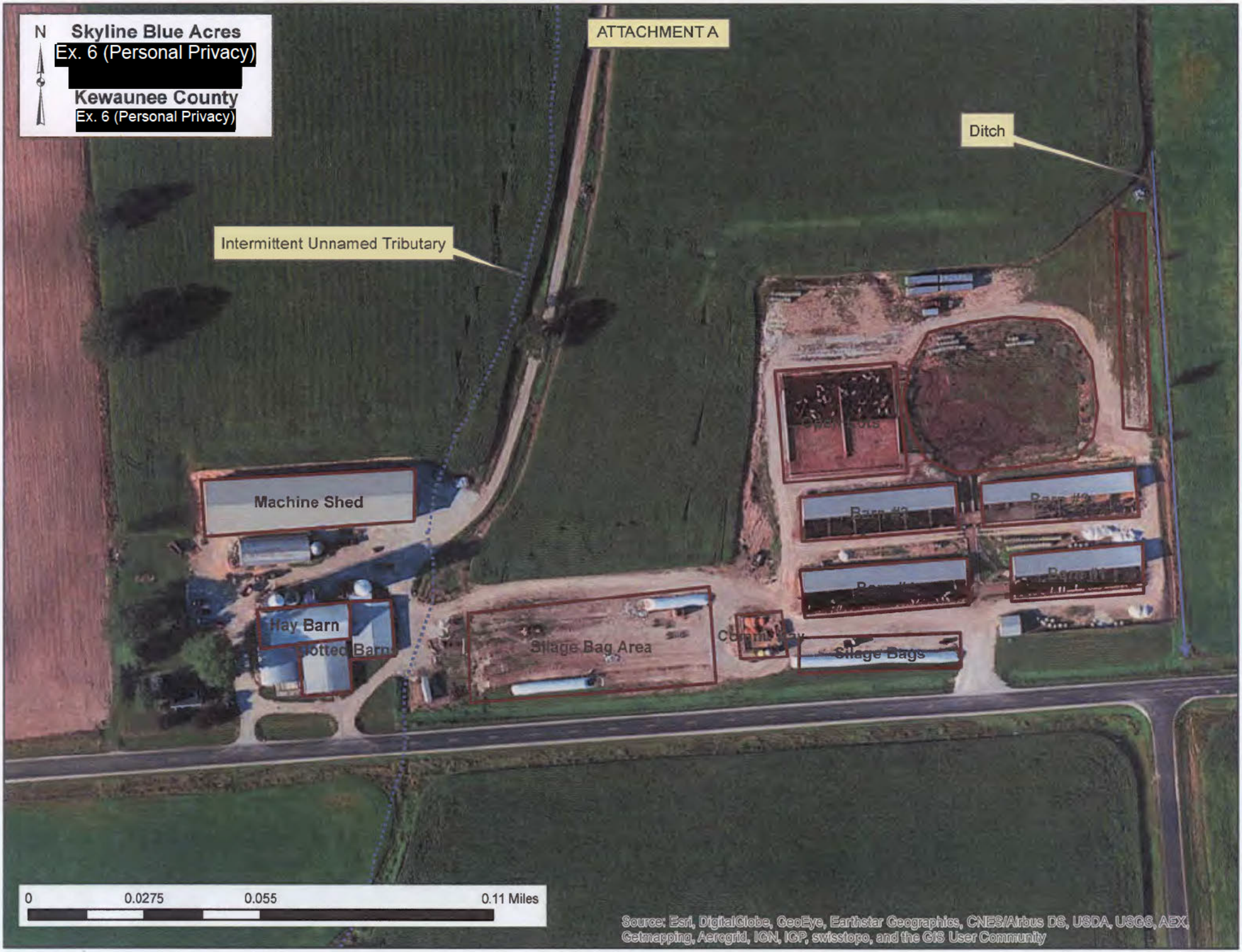
4. AREAS OF CONCERN

EPA noted that there were no runoff controls from the Commodities Bay. Facility owner stated that a cover for the bay was to be delivered in May 2017.

5. LIST OF ATTACHMENTS

A) Aerial photograph of Skyline Blue Acres with buildings and waterways labeled.

B) Photolog and Description of Walkthrough


N
Skyline Blue Acres
Ex. 6 (Personal Privacy)
Kewaunee County
Ex. 6 (Personal Privacy)
ATTACHMENT A
Ditch
Intermittent Unnamed Tributary
Machine Shed
Hay Barn
Silage Bag Area
Silage Bags
0
0.0275
0.055
0.11 Miles
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

ATTACHMENT B – PHOTOLOG AND DESCRIPTION OF WALKTHROUGH
Skyline Blue Acres
EPA Inspection April 20, 2017
All photos taken by Carla Valdes, Enforcement Officer, U.S. EPA
Camera: Ricoh WG-4 GPS

1: P4200001
Description: Buffer of vegetation along the roadside ditch. Precipitation flowing from facility to roadside ditch did not appear to contain any pollutants from the facility.
Location: Along County Road BB on south side of facility.
Camera Direction: Southwest
Date/Time: April 20, 2017 10:39 A.M.

EPA began the inspection at 9:15 A.M. after meeting with the facility owner. EPA went through the facility checklist and then began the walkthrough on the north side of County Road BB, west of the silage bag area. Since the area had received rain the previous night and it was still lightly raining, there was runoff of storm water to the roadside ditch on the north side of the road. EPA noted that the vegetation in the roadside ditch the vegetation that was intended as a buffer north of the ditch was not nutrient burned and the storm water was clear. The silage bags were closed on the west end and EPA did not observe any leachate coming from the bagged silage on this side on the day of the inspection.

A barn with a slotted floor and a pit below the barn confined approximately 140 head of cattle. EPA did not observe any runoff of manure or process wastewater from this barn on the day of the inspection.

EPA walked east along between the roadside ditch and additional silage bags south of Barn #4. These bags were closed and the edges sealed with gravel. EPA observed the storm water channel from the ancillary area around Barn #4 and these silage bags to the roadside ditch. EPA did not observe any manure or process wastewater flowing with the precipitation to the roadside ditch on the day of the inspection. Additionally, a bulk bin for feed products did not have spilled feed below it that could have been transported to the roadside ditch with the precipitation.

2: P4200002
Description: Buffer of vegetation along the roadside ditch. Liquid flowing into the ditch was clear.
Location: Along County Road BB on south side of facility.
Camera Direction: Southwest
Date/Time: April 20, 2017 10:39 A.M.

3: P4200003
Description: Buffer of vegetation along the road ditch.
Location: Along County Road BB on south side of facility.
Camera Direction: Southeast
Date/Time: April 20, 2017 10:39 A.M.

4: P4200004
Description: Silage bags are tightly sealed. Stormwater flowing from this area was clear.
Location: West of the silage bags.
Camera Direction: North
Date/Time: April 20, 2017 10:40 A.M.

5: P4200005
Description: Piles of stone and gravel on facility driveway.
Location: West of the silage bags.
Camera Direction: Northwest
Date/Time: April 20, 2017 10:40 A.M.

6: P4200006
Description: Silage bag south of Barn #4 was sealed on the west side. Stormwater runoff from driveway was clear.
Location: Southwest of Barn #4.
Camera Direction: East
Date/Time: April 20, 2017 10:43 A.M.

7: P4200007
Description: Flow from the driveway and some ancillary areas would flow to the roadside ditch to the south.
Location: Southwest of Barn #4.
Camera Direction: South
Date/Time: April 20, 2017 10:43 A.M.

In the area west of Barn #4 there was a commodity bay for high moisture corn and wet distillers grains. This bay was not covered and runoff of feed and process wastewater could flow out of the bay. The flow of the process wastewater would be to the north around the north wall of the commodity bay and then along the facility driveway to the northwest to a crop field. EPA did not observe any process wastewater flowing in this way on the day of the inspection. The facility owner stated that he had purchased a cover for the commodity bay and it was supposed to be delivered in May 2017.

8: P4200008
Description: Commodity Bay was open to precipitation although a cover was ordered and would be delivered in May 2017. Process wastewater from the corn and wet distillers grains would flow out of the bay and then to the northwest across the facility driveway and to a crop field north of the Silage Bag area.
Location: East of Commodity Bay.
Camera Direction: West
Date/Time: April 20, 2017 10:45 A.M.

EPA then walked to the east along the south side of Barns # 4 and #1. A high concrete wall on Barn #4 and high wooden wall on Barn #1 kept feed in the feed trough. EPA noted some spilled feed outside the wall, but the amount was minimal and EPA did not observe any feed being transported with precipitation to surface waters.

Between the barns, EPA observed the concrete scrape alley. The barns are scraped every few days if the manure is liquid enough. The manure is scraped to the center scrape alley and then directly to the Manure Pond. The scrape alley has a push off bar across the opening at the Manure Pond to prevent a skid steer from accidentally falling into the pond. The scrape alley is sloped toward the pond and EPA did not observe any manure or process wastewater from leaving the barns or the scrape alley on the day of the inspection.

9: P4200009
Description: The flow of process wastewater off the Commodity Bay is to the northwest.
Location: East of Commodity Bay.
Camera Direction: Northwest
Date/Time: April 20, 2017 10:45 A.M.

10: P4200010
Description: Flow of process wastewater off the Commodity Bay would be around the north wall and then to the northwest across the facility driveway.
Location: Northeast of the Commodity Bay
Camera Direction: Southwest

Date/Time: April 20, 2017 10:46 A.M.

11: P4200011
Description: Flow of process wastewater off the Commodity Bay would be to the northwest and to a crop field.
Location: Northeast of the Commodity Bay.
Camera Direction: northwest.
Date/Time: April 20, 2017 10:46 A.M.

12: P4200012
Description: A high wall along the feed alley of the barns prevents feed from being pushed out.
Location: Southeast of Barn #4.
Camera Direction: West
Date/Time: April 20, 2017 10:49 A.M.

13: P4200013
Description: Very little feed was on top of the feed alley wall and on the ground outside the pen.
Location: South of Barn #4.
Camera Direction: North
Date/Time: April 20, 2017 10:49 A.M.

14: P4200014
Description: Very little feed was on top of the feed alley wall and on the ground outside the pen.
Location: South of Barn #4.
Camera Direction: Northeast
Date/Time: April 20, 2017 10:49 A.M.

15: P4200015
Description: Very little feed was on top of the feed alley wall and on the ground outside the pen.
Location: South of Barn #4.
Camera Direction: East
Date/Time: April 20, 2017 10:49 A.M.

16: P4200016
Description: Scrape Alley between the barns. Manure is pushed to the Scrape Alley and then to the Manure Pond. There is a safety bar at the end of the alley before the pond.
Location: Southeast of Barn #4.
Camera Direction: North
Date/Time: April 20, 2017 10:51 A.M.

17: P4200017
Description: Scrape Alley with safety bar.
Location: Southeast of Barn #4.
Camera Direction: North
Date/Time: April 20, 2017 10:52 A.M.

18: P4200018
Description: South side of Barn #1 in foreground and Barn #4 in background. Very little feed on the ground in front of the feed lanes.
Location: South of Barn #1.
Camera Direction: West
Date/Time: April 20, 2017 10:53 A.M..

19: P4200019
Description: High wall prevents feed from leaving the feed lane.
Location: South of Barn #1.
Camera Direction: North
Date/Time: April 20, 2017 10:54 A.M.

20: P4200020
Description: High wall prevents feed from leaving the feed lane.
Location: South of Barn #1.
Camera Direction: Northeast
Date/Time: April 20, 2017 10:54 A.M.

EPA then walked to the east side of the facility and observed the storm water ditch that flows from north to south along the east side of the facility. There was water in the ditch and it appeared clean on the day of the inspection.

21: P4200021
Description: Stormwater ditch on east side of facility flows to the south to the roadside ditch. The water in the ditch was clear and there was no evidence of buildup of pollutants in the ditch.
Location: Northeast of Barn #2.
Camera Direction: North
Date/Time: April 20, 2017 10:55 A.M.

A storm water pathway flowed from west to east along the north side of Barn #2. The flow went through a culvert under the facility driveway. EPA did not observe any manure or process wastewater from the barns flowing into the storm water pathway. There were several round bales of hay and hay on the ground near this storm water pathway.

22: P4200022
Description: Stormwater pathway north of Barn #2 flows to the east and to a culvert under the facility driveway and then to the ditch on the east side of the facility.
Location: Northeast of Barn #2.

Camera Direction: West
Date/Time: April 20, 2017 10:57 A.M.
EPA noted hay on the ground near the confluence of the storm water pathway and the ditch on the east side. The facility owner stated that the hay had been blown there by the wind recently.

23: P4200023
Description: Outlet of culvert under facility driveway from stormwater pathway north of Barn #2. Water in pathway was clear.
Location: Northeast of Barn #2.
Camera Direction: East
Date/Time: April 20, 2017 10:57 A.M.

24: P4200024
Description: Outlet of culvert under facility driveway from stormwater pathway north of Barn #2. Water in pathway was clear.
Location: Northeast of Barn #2.

Camera Direction: Southeast
Date/Time: April 20, 2017 10:57 A.M.

25: P4200025
Description: Inlet of culvert under facility driveway from stormwater pathway north of Barn #2. Water in pathway was clear.
Location: Northeast of Barn #2.
Camera Direction: Down
Date/Time: April 20, 2017 10:58 A.M.

EPA then walked to the north and observed another bag of silage that was open on the south side. The tarp had been cut back and the silage was open to precipitation. A small amount of leachate was observed near the openiing of the bag. The bag was located very near the ditch on the east side of the facility and EPA advised the facility owner that there was a potential for this leachate to reach the ditch on the east side of the facility if the flow from precipitation was great enough. This bag of silage was also open on the north end. EPA did not observe a discharge of feed or process wastewater to the ditch on the east side of the facility on the day of the inspection.

EPA then walked to the west and observed the Manure Pond. There was a heavy crust – 3 feet, according to the facility owner – on top of the manure in the pond. A staff gauge in the berm on the south side of the pond showed that there was approximately 3.5' before reaching the margin of safety mark. EPA estimated that there was approximately 4.5' of freeboard in the pond. The bers of the pond were well maintained and EPA did not observe any woody growth or rodent holes.

26: P4200026
Description: Open silage bag on east side of facility. Small amount of leachate and track in/track out at the opening.
Location: East of the Manure Pond.
Camera Direction: North
Date/Time: April 20, 2017 11:01 A.M.

27: P4200027
Description: Open silage bag on east side of facility. Small amount of leachate and track in/track out at the opening.
Location: East of the Manure Pond.
Camera Direction: North and down
Date/Time: April 20, 2017 11:01 A.M.

28: P4200028
Description: Open silage bag on east side of facility had a small amount of leachate and track in/track out at the opening. EPA did not observe the leachate or the feed flow over the dirt berm and into the ditch on the east side of the facility.
Location: East of the Manure Pond.
Camera Direction: South
Date/Time: April 20, 2017 11:02 A.M.

29: P4200029
Description: Manure Pond has a heavy crust on it.
Location: Southeast corner of the Manure Pond.
Camera Direction: West
Date/Time: April 20, 2017 11:03 A.M.

30: P4200030
Description: Manure Pond has a heavy crust on it.
Location: Southeast corner of the Manure Pond.
Camera Direction: West
Date/Time: April 20, 2017 11:03 A.M.

31: P4200031
Description: Manure Pond berms are well maintained.
Location: Southeast corner of the Manure Pond.
Camera Direction: North
Date/Time: April 20, 2017 11:03 A.M.

32: P4200032
Description: Staff gauge in the Manure Pond. EPA estimated that there was approximately four and a half feet of freeboard in the pond.
Location: Southeast corner of the Manure Pond.
Camera Direction: West
Date/Time: April 20, 2017 11:04 A.M.

33: P4200033
Description: Bars on staff gauge (one is visible and circled in yellow) are placed to represent two feet of vertical depth in the pond.
Location: South side of Manure Pond.
Camera Direction: Northeast and down
Date/Time: April 20, 2017 11:05 A.M.

EPA then walked around the east and north sides of the Manure Pond and to the west to the open lots. At the northwest corner of the open lots was a gate and the concrete feed trough. The lots are sloped to the east so manure and process wastewater flowed and could be scraped directly to the Manure Pond. The ground around the concrete was higher than the concrete to prevent the manure and process wastewater from flowing away from the Manure Pond.

EPA noted a small amount of feed on the outside of the ground outside the feed troughs and many round bales of hay were stored just to the north of and on the west side of the open lots. Blowoff of hay and process wastewater from any feed outside the feed troughs would flow to the west and to the crop field.

EPA then continued south along the west side of the open lots and Barns #3 and #4. EPA noted that there was a concrete mountable curb beneath the gate for Barn #3. This prevented any manure or process wastewater from leaving the open pens of the barn. Additional round hay bales were stored between Barns #3 and #4 and EPA observed many blue drums on the north side of Barn #4. The facility owner stated that they contained maltodextrin extract, which he uses as a food additive. Empty drums were waiting for recycling in a pile to the west of Barn #3.

34: P4200034
Description: The feed trough for the open lots is on the north side. Manure from the open lots is scraped directly to the Manure Pond.
Location: Northwest corner of the Manure Pond.
Camera Direction: Southwest
Date/Time: April 20, 2017 11:09 A.M.

35: P4200035
Description: Manure from the open lots is scraped directly into the Manure Pond.
Location: Northwest corner of the Manure Pond.
Camera Direction: Southeast
Date/Time: April 20, 2017 11:09 A.M.

36: P4200036
Description: A small amount of feed was on the ground outside the feed trough for the open lots.
Location: North of the open lots.
Camera Direction: Southeast
Date/Time: April 20, 2017 11:10 A.M.

37: P4200037
Description: A small amount of feed was on the ground outside the feed trough for the open lots.
Location: North of the open lots.
Camera Direction: Southwest
Date/Time: April 20, 2017 11:10 A.M.

38: P4200038
Description: A small amount of feed was on the ground outside the feed trough for the open lots. Round bales were located to the north of the open lots.
Location: North of the open lots.
Camera Direction: West
Date/Time: April 20, 2017 11:11 A.M.

39: P4200039
Description: West side gate for the open lots. Manure and process wastewater from the open lots would flow to the east and toward the Manure Pond. There was a small rise in the ground outside the gate that prevented manure and process wastewater from flowing to the west.
Location: Northwest corner of the open lots.
Camera Direction: Northeast
Date/Time: April 20, 2017 11:12 A.M.

40: P4200040
Description: EPA did not observe any channeling or flow of manure or process wastewater from the open lots to the west and to the crop field.
Location: Northwest corner of the open lots.
Camera Direction: Northwest
Date/Time: April 20, 2017 11:12 A.M.

41: P4200041
Description: Small amount of feed on the ground outside the feed trough on the south side of the open lots.
Location: Southwest corner of the open lots.
Camera Direction: Northeast
Date/Time: April 20, 2017 11:21 A.M.

42: P4200042
Description: EPA did not observe any flow of manure or process wastewater leaving the open lots on the west side.
Location: Southwest corner of the open lots.
Camera Direction: Northeast
Date/Time: April 20, 2017 11:22 A.M.

43: P4200043
Description: Feed trough for Barn #3. Note the concrete mountable curbing below the gate.
Location: West side of Barn #3.
Camera Direction: East
Date/Time: April 20, 2017 11:22 A.M.

44: P4200044
Description: Barrels contain Maltodextrin extract, a food additive.
Location: North of Barn #4.
Camera Direction: Southeast
Date/Time: April 20, 2017 11:23 A.M.

45: P4200045
Description: Barrels contain Maltodextrin extract, a food additive.
Location: North of Barn #4.
Camera Direction: South
Date/Time: April 20, 2017 11:23 A.M.

46: P4200046
Description: Empty barrels are piled for pickup for recycling.
Location: West of Barn #4
Camera Direction: West
Date/Time: April 20, 2017 11:23 A.M.

47: P4200047
Description: Mountable concrete curbing at opening to Barn #4.
Location: West of Barn #4.
Camera Direction: Southwest
Date/Time: April 20, 2017 11:24 A.M.

EPA then walked west along the silage bag area and noted that the bag furthest to the north was almost completely emptied. A very small amount of feed was left on the ground near the opening of the bag, but EPA did not observe any additional spilled silage where the bag had

been. On the day of the inspection, EPA did not observe this silage flow with precipitation to a surface water. A shovel was placed at each open bag for the facility personnel to use to clean up any spilled feed.

48: P4200048
Description: An almost completely used bag of silage is just out of camera view at lower left. Photo shows the small amount of silage on the ground where silage bag was emptied.
Location: Northeast corner of silage bag area.
Camera Direction: West
Date/Time: April 20, 2017 11:26 A.M.

49: P4200049
Description: Facility owner states that they keep a shovel near the open end of any silage bag for immediate clean up any spilled feed.
Location: Northeast corner of silage bag area.
Camera Direction: South

Date/Time: April 20, 2017 11:26 A.M.

50: P4200050
Description: Silage bag is almost completely emptied. Facility owner stated that they leave enough plastic on the edge to keep the open end closed when not removing feed.
Location: Northeast corner of silage bag area.
Camera Direction: Southeast
Date/Time: April 20, 2017 11:26 A.M.

On the west side of the silage bag area, the intermittent unnamed tributary bisects the facility from north to south. As it flows south along a facility driveway, it enters a culvert northwest of the silage bag area. The culvert allows the flow to go under the facility driveway and then outlet on the south side. The intermittent unnamed tributary then flows over the land until it reaches the culvert on the north side of County Road BB and flows south under the road. Prior to the culvert under County Road BB, two field tile pipes outlet into the tributary.

On the day of the inspection, EPA did not observe any feed, manure or process wastewater enter the intermittent unnamed tributary before it reached the culvert on the north side of County Road BB.

51: P4200051
Description: Inlet under facility driveway for intermittent unnamed tributary of Black Creek. Flow of the stream is from the north.
Location: North of facility driveway at northwest corner of silage bag area.
Camera Direction: Northeast
Date/Time: April 20, 2017 11:28 A.M.

52: P4200052
Description: Looking upstream at the intermittent unnamed tributary of Black Creek which flows from north to south.
Location: North of facility driveway at northwest corner of silage bag area.
Camera Direction: North
Date/Time: April 20, 2017 11:28 A.M.

53: P4200053
Description: Outlet of culvert pipe for intermittent unnamed tributary of Black Creek under facility driveway and into another culvert which transports the flow to the south.
Location: Northwest corner of silage bag area.
Camera Direction: Down
Date/Time: April 20, 2017 11:28 A.M.

54: P4200054
Description: Outlet of previous culvert pipe for intermittent unnamed tributary of Black Creek under the facility driveway.
Location: Southwest corner of silage bag area.
Camera Direction: South
Date/Time: April 20, 2017 11:29 A.M.

55: P4200055
Description: Culvert under County Road BB for intermittent unnamed stream of Black Creek.
Location: North of County Road BB.
Camera Direction: South
Date/Time: April 20, 2017 11:29 A.M.

56: P4200056
Description: Tile outlet pipe for field tiles.
Location: North of County Road BB.
Camera Direction: Northeast and down
Date/Time: April 20, 2017 11:30 A.M.

57: P4200057
Description: Tile drainage pipes for field tiles.
Location: North of County Road BB.
Camera Direction: Northeast and down
Date/Time: April 20, 2017 11:30 A.M.

58: P4200058
Description: Culvert outlet of intermittent unnamed tributary of Black Creek south of County Road BB.
Location: South side of County Road BB.
Camera Direction: Southeast and down
Date/Time: April 20, 2017 11:31 A.M.

59: P4200059
Description: Culvert outlet of intermittent unnamed tributary of Black Creek south of County Road BB.
Location: South side of County Road BB.
Camera Direction: South
Date/Time: April 20, 2017 11:31 A.M.

60: P4200060
Description: Intermittent unnamed tributary of Black Creek south of County Road BB.
Location: South side of County Road BB.
Camera Direction: South
Date/Time: April 20, 2017 11:31 A.M.

EPA concluded the walkthrough portion of the inspecton at approximately 11:30 A.M.